

## Field Comment Log

### AC 20-153B "Acceptance of Aeronautical Data Processes and Associated Databases"

#	Commenter	Page Number	Paragraph Number	Referenced Text	Comment/Rationale or Question	Proposed Resolution	Comment Type (Conceptual, Editorial, or Format)	Disposition
1	Barbara Lingberg, AIR-134	2 and 9	2 and 9.3.1	Both sections reference O8110.49 (Chap 15).	While I like the concept of two documents referencing each other, the link can be broken when a change is made to one or both. This can happen even when we don't reference the specific revision of a document. We are in process of revising O8110.49. When we do, AC 20-153B may or may not be referenced, and, if it is, it won't be in Chap 15. In addition, it seems odd that an AC (guidance) should be referenced an Order (policy).	If you are dependent on the wording in the Order, then I suggest you bring that wording into this AC and delete references to the Order.	Conceptual	<b>Accepted.</b> Reference to order deleted and text made to stand alone.
2	Barbara Lingberg, AIR-134	2	3.3	"This AC requires data suppliers provide a release..."	The sentence is missing a word.	Insert "to" before provide so that it reads "This AC requires data suppliers to provide a release..."	Editorial	<b>Accepted.</b>
3	Barbara Lingberg, AIR-134	16	12.3.1	References exist to AC 20-115C.	Is the reference really meant to be to the AC itself or to the two RTCA documents - DO-178B and DO-178C? If the latter, than I suggest replacing the reference to AC 20-115C with references to the two documents. This change would also need to be made in other places where AC 20-115C is referenced in this AC. Also, please note that we are in process of revising AC 20-115C.		Conceptual	<b>Accepted.</b>

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4	Barbara Lingberg, AIR-134	16, 17, and A3-6, respectively	12.1 ,12.3.2 and obj 3-8	References are made to DO-178C software life cycle data.	Is this meant to imply that satisfaction of DO-178B is not allowed? Please note that AC 20-115C allows use of DO-178B under certain conditions. If DO-178B is meant to be referenced by this AC, this appropriate changes need to be made	Please clarify.	Conceptual	<b>Accepted.</b>
5	Barbara Lingberg, AIR-134	19	14	References to ACs and RTCA documents	1) Orders are referenced in the AC but not in this section (see comment 1 about removing reference to Order in body of AC). 2) Depending on response to Comment 4, reference to DO-178B may be needed for completeness.	See Comment.	Editorial.	<b>Accepted.</b>
6	Nicole Mikel-Brumfield, AIR-400	1	2	Second sentence of para. 2 states that "the standards used in this AC do not apply to Contracting States, or entities acting on behalf of Contracting States, publishing data as addresses in International Civil Aviation Organization (ICAO) Annex 15."	All AC users may not be familiar with ICAO Annex 15. For this reason, it is necessary to provide additional information on ICAO Annex 15 to ensure understanding of why this AC is not applicable in certain scenarios.	The title for Annex 15 should be added to the paragraph. Additionally, an additional sentence should be considered as to explaining why this AC is not applicable to the publication of data as addressed in Annex 15.	Conceptual	<b>Accepted.</b>
7	John Britton, AIR-500 (Lockheed Martin/NISC)	1	Header	The placeholder used for "Date:"	"XX/XX/XX" is rightly used as a placeholder until this AC is ready to be signed	Strike the placeholder and replace with the signature date once that is known.	Format	<b>Accepted.</b>
8	John Britton, AIR-500 (Lockheed Martin/NISC)	1	1.2.3	"...aeronautical data process meet..."	There is a number/verb agreement issue	Use either "processes meet" or "process meets"	Editorial	<b>Accepted.</b>
9	John Britton, AIR-500 (Lockheed Martin/NISC)	2	2	"...to the aircraft (i.e., airborne system databases) (reference FAA Order 8110.49, Software Approval Guidelines, (Chapter 15))."	In the last sentence of 2, there are three opening parentheses used, but only two closing parentheses	Strike the parentheses that is placed immediately before the word "Chapter"	Editorial	<b>Previously Accepted.</b>

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10	John Britton, AIR-500 (Lockheed Martin/NISC)	2	3.2, 2nd bullet	"...from a navigation data centric focus..."	Two words are used to modify a third, so a hyphen is needed	Change "data centric focus" to "data-centric focus"	Editorial	<b>Accepted.</b>
11	John Britton, AIR-500 (Lockheed Martin/NISC)	2	3.2, 9th bullet	"...(shalls)..."	As per FAA writing standards, the word "shall" is not to be used in ACs. Also, the use of "shalls" here seems awkward. If used, it should be in quotation marks inside the parentheses.	If some clarification in parentheses is desired, strike "shall" and consider replacing with "must-dos" or something like that.	Editorial	<b>Partially Accepted.</b> Added parentheses to text.
12	John Britton, AIR-500 (Lockheed Martin/NISC)	2	3.3 & UNIVERSAL	"This AC requires data suppliers provide..."	Ease of reading could be improved by inserting the word "to" before "provide"	Insert the word "to" for: "This AC requires data suppliers to provide..."	Editorial	<b>Previously Accepted.</b>
13	John Britton, AIR-500 (Lockheed Martin/NISC)	4	8.1 & UNIVERSAL	"...letter issued by a FAA aircraft certification office (ACO) documenting a data supplier has met..."	The acronym "FAA" requires the word "an" before it when this indefinite article is needed. Also, adding the word "that" could improve the ease of reading here.	Replace "a" with "an" and insert the word "that" for: "...letter issued by <b>an</b> FAA aircraft certification office (ACO) documenting <b>that</b> a data supplier has met..."	Editorial	<b>Partially Accepted.</b> Changed indefinite article to "an" before initialization of FAA here and 11.1. Globally corrected prior to LOA also. Use of the word "that" in this case is optional and does not add clarity to the clause.
14	John Britton, AIR-500 (Lockheed Martin/NISC)	5	8.2	"...the database integrity is determined at time of airworthiness approval..."	The word "the" seems to be missing from this sentence, making the wording too cryptic.	Insert "the" between the words "at" and "time" for: "...is determined at <b>the</b> time of..."	Editorial	<b>Accepted.</b>
15	John Britton, AIR-500 (Lockheed Martin/NISC)	7	9.1	"...to gain FAA acceptance of a data suppliers aeronautical data processes."	An apostrophe is missing here to indicated the singular possessive.	Change "suppliers" to "supplier's"	Editorial	<b>Accepted.</b>
16	John Britton, AIR-500 (Lockheed Martin/NISC)	7	9.1.2.2	"...or to a data supplier who can establish <b>its</b> data requirements are identical..."	This sentence talks about a DAH or a data supplier, so the relative pronoun "who" is used accurately to refer to these two people. The use of the word "its" to refer to the same people is not the correct possessive adjective to use, as it is singular and impersonal.	Replace "its" with "their" for: "...or to a data supplier who can establish <b>their</b> data requirements are identical..."	Editorial	<b>Not Accepted.</b> Use of "its" is appropriate as this reference is to different entities, not the same.

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17	John Britton, AIR-500 (Lockheed Martin/NISC)	9	9.3.1	"Define the data process techniques and procedures (i.e., Quality Management (QM) process) <b>from</b> origination of the data through loading the data into the application, <b>of</b> ensuring the quality..."	The phrase beginning with "of ensuring" seems awkward and does not seem to follow the previous clause starting with "from."	Please amend as needed to clarify the meaning and to establish better wording.	Editorial	<b>Not Accepted.</b> No correction offered.
18	John Britton, AIR-500 (Lockheed Martin/NISC)	12	10.2	The subtitle: <b>LOA post acceptance responsibilities.</b>	The two words describing "responsibilities" should be hyphenated	Insert a hyphen after "post" for:  LOA post-acceptance responsibilities	Editorial	<b>Accepted.</b>
19	John Britton, AIR-500 (Lockheed Martin/NISC)	12	10.2.2	"You must report all changes to the QMS affecting the data quality objectives to the..."	The use of "reporting...to the" at first seems to direct this reporting to "the QMS," which could be confusing.	Consider clarifying by inserting <b>"made to the"</b> as follows:  "You must report all changes <b>made</b> to the QMS affecting the data quality objectives to the..."	Editorial	<b>Accepted.</b> Also corrected Appendix 3, 1-3.
20	John Britton, AIR-500 (Lockheed Martin/NISC)	12	10.2.5 & UNIVERSAL	"...all users and the FAA (ACO/MIDO from which the LOA was obtained),..."	Parentheses are used extensively throughout this document, which is fine. In most cases, the parentheses begins with "i.e." (for "that is") or "e.g." (for "for example") to inform the reader about the purpose of the words set off by parentheses. In this case, however, and in many other such uses throughout this AC, no such introduction is used. Such introductions are not always needed, but it seems that some means of clarifying is needed here since "ACO/MIDO" does not mean "the FAA."	Please review all such uses of parentheses and determine when "e.g." and "i.e." are needed and when they are not.	Editorial	<b>Not Accepted.</b> No correction offered.
21	John Britton, AIR-500 (Lockheed Martin/NISC)	12	10.2.6, 1.	"LOA Status"	"Status" is capitalized in 10.2.6, 1., but not two lines above when used in 10.2.6.	The descriptions of the items listed in 1.-3. here do not appear to be official subtitles that must be capitalized. Therefore, strike the "S" and use the lower case for "LOA status (..."	Editorial	<b>Accepted.</b>

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22	John Britton, AIR-500 (Lockheed Martin/NISC)	12	10.2.6, 2. & 10.2.6, 3. & UNIVERSAL	"...DQRs (e.g., deletion of procedures due to source / processing errors..."  "...any deviations / alterations so the operator / end-user can satisfy..."	The slash (/), also known as the forward slash or virgule, is used often in this AC -- perhaps too often, as the slash does not have a large role in formal English.  The slash can be translated as "or," so its use in "operator/end-user" seems appropriate.  When the slash is used, there should be <b>no space</b> between the slash and the letters on either side of it.	Please review the use of the slash in this AC. For a guidance document like an AC, perhaps its frequent use is acceptable. In each usage, however, the spaces on either side of the slash must be removed.	Editorial	<b>Partially Accepted.</b> Reviewed document for slash use and made corrections. Guidance in the Chicago Manual of Style §6.104 states: "A slash most commonly signifies alternatives. In certain contexts it is a convenient (if somewhat informal) shorthand for or. It is also used for alternative spellings or names. Where one or more of the terms separated by slashes is an open compound, a space before and after the slash can be helpful." In this AC where open compounds exist, a space has been used before and after the slash.
23	John Britton, AIR-500 (Lockheed Martin/NISC)	13	10.2.6, 3. Note	"The release statement may be in the form of an enclosed document, or an electronic posting..."	The comma here does not belong between the first and second items in this series of three options.	Remove the comma. You could strike the first "or" and insert a new comma before the second "or," for:  "The release statement may be in the form of an enclosed document, an electronic posting..., or <b>it may appear</b> on the web."	Editorial	<b>Accepted.</b>
24	John Britton, AIR-500 (Lockheed Martin/NISC)	13	10.2.8, Note	"...posting a copy of the LOA on a <b>web site</b> for customers..."	In 14.1. below, the word "website" (all one word) is used, whereas here "web site" is used.	While "website" is becoming the preferred way to write this, either form is acceptable. Please pick the version used in your FAA materials most often and apply consistently.	Editorial	<b>Accepted.</b>
25	John Britton, AIR-500 (Lockheed Martin/NISC)	13	11.1	"A data supplier seeking a FAA LOA for acceptance..."	The acronym "FAA" requires the word "an" before it when an indefinite article is needed.	Replace "a" with "an."	Editorial	<b>Previously Accepted.</b>

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26	John Britton, AIR-500 (Lockheed Martin/NISC)	13	11.2.1.1	"...by FAA LOA, <b>the responsibility to validate the incoming data meets</b> the DQRs is discharged (reference RTCA/DO-200B, section 1.5 and 2.3.3 (3)). Likewise, for data published in the AIP,... <b>the responsibility to validate the incoming data meets</b> the DQRs is discharged (we refer..."	The reader is likely to stumble over the phrase in bold here -- used twice in this paragraph -- without the addition of the word "that" in each phrase.	Consider inserting "that" twice in this paragraph, as follows:  "...by FAA LOA, the responsibility to validate <b>that</b> the incoming data meets the DQRs is discharged (reference RTCA/DO-200B, section 1.5 and 2.3.3 (3)). Likewise, for data published in the AIP,...the responsibility to validate <b>that</b> the incoming data meets the DQRs is discharged (we refer..."	Editorial	<b>Not Accepted.</b> Use of the word "that" in this case is optional and does not add clarity to the clause.
27	John Britton, AIR-500 (Lockheed Martin/NISC)	14	11.2.1.3 & 11.2.1.4	"Acceptable techniques for the verification and validation of airport map data <b>are in</b> RTCA/DO-272D,..."	Used twice here, the statement that "Acceptable techniques... <b>are in</b> RTCA/DO..." is a bit awkward and imprecise.	Consider adding the words "may be found in" for:  "Acceptable techniques for the verification and validation of airport map data <b>may be found in</b> RTCA/DO-272D,..."	Editorial	<b>Not Accepted.</b> Introduces passive voice.
28	John Britton, AIR-500 (Lockheed Martin/NISC)	15	11.2.2	"...developed with higher development assurance levels (IDAL),..."	The acronym "IDAL" is not represented by the words here. Other FAA documents state that IDAL stands for "item development assurance level."	Please verify this acronym and correct as necessary, perhaps with:  "...developed with higher <b>item</b> development assurance levels (IDAL),..."	Editorial	<b>Accepted.</b>
29	John Britton, AIR-500 (Lockheed Martin/NISC)	15	12.1	"Many aircraft and avionics manufacturers obtained approval for systems prior to the issuance of this AC, and may not have..."	The comma here separates the first verb phrase from the second and does not belong.	Strike the comma for:  "Many aircraft and avionics manufacturers obtained approval for systems prior to the issuance of this <b>AC and</b> may not have..."	Editorial	<b>Accepted.</b>
30	John Britton, AIR-500 (Lockheed Martin/NISC)	16	12.1	"Typically, the data format accuracy and resolution are in the original RTCA/DO-178C documentation, and the corresponding..."	The second comma here does not belong (same reason as above).	Strike the comma for:  "Typically, the data format accuracy and resolution are in the original RTCA/DO-178C <b>documentation and</b> the corresponding..."	Editorial	<b>Accepted.</b>

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31	John Britton, AIR-500 (Lockheed Martin/NISC)	16	12.2	"...company-specific format requirements (field by field description of what is delivered in the packed data)."	The words "field by field" should be hyphenated, and "e.g." should be used at the beginning of the parentheses.	Hyphenate and add "e.g." for: "...company-specific format requirements ( <b>e.g., field-by-field</b> description of what is delivered in the packed data)."	Editorial	<b>Accepted.</b>
32	John Britton, AIR-500 (Lockheed Martin/NISC)	17	12.3.2	"Navigation, obstacle, and airport map data <b>changes</b> frequently."	There is a number/verb agreement issue: [ these three items ] <b>change</b> frequently.	Replace "changes" with "change" for: "Navigation, obstacle, and airport map data <b>change</b> frequently."	Editorial	<b>Accepted.</b>
33	John Britton, AIR-500 (Lockheed Martin/NISC)	17	12.3.2	"...without requiring the data (e.g., loadable media) become part of the RTCA/DO-178C..."	The wording here is a bit awkward.	Consider changing to: "without requiring <b>that</b> the data...become" or "without requiring <b>that</b> the data... <b>be included in</b> ..."	Editorial	<b>Not Accepted.</b> Use of the word "that" in this case is optional and does not add clarity to the clause.
34	John Britton, AIR-500 (Lockheed Martin/NISC)	18	12.6, Example	"...obtaining a Type 2 Letter of Acceptance ( <b>LOA</b> )..."	The acronym LOA has already been defined in this AC in 1.2.3 and 3.1, so it does not need to be spelled out again here.	If you want to spell out "Type 2 Letter of Acceptance," then you should strike "(LOA)". Otherwise, strike "Letter of Acceptance" for: "...a Type 2 LOA."	Editorial	<b>Not Accepted.</b> This text is an example of AFM language and needs to spell out the acronym for clarity.

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35	John Britton, AIR-500 (Lockheed Martin/NISC)	18	13.1	"The end user (operator) is ultimately responsible for..."	The term "end-user" is used several times in this AC, and each time it is hyphenated, except for here in 13.1.  Also, "operators/end-users" is used often in this AC, and the slash is used each time to separate these terms, not parentheses -- except for here in 13.1.	Pick the form of these terms that is most common in FAA and aviation circles, and then apply that usage consistently throughout this AC.	Editorial	<b>Not Accepted.</b> See previous comment. Guidance in the Chicago Manual of Style §6.104 states: "A slash most commonly signifies alternatives. In certain contexts it is a convenient (if somewhat informal) shorthand for or. It is also used for alternative spellings or names. Where one or more of the terms separated by slashes is an open compound, a space before and after the slash can be helpful." In this AC where open compounds exist, a space has been used before and after the slash.
36	John Britton, AIR-500 (Lockheed Martin/NISC)	19	14.2 & 14.3	"on line" and "online"	The same term (i.e., "online") is used in two different forms in back-to-back paragraphs.	While "online" is the preferred way of writing out this term, select which form you want to use and apply it consistently in this AC.	Editorial	<b>Accepted.</b>
37	John Britton, AIR-500 (Lockheed Martin/NISC)	20	14.5.2	14.5.2 ARINC Specification 816, Embedded <b>interchange</b> Format for Airport Mapping Database.	The title referenced in 14.5.2 has a significant word ("interchange") that is listed in lower case.	Change "interchange" to "Interchange" in this title.	Editorial	<b>Accepted.</b>

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38	John Britton, AIR-500 (Lockheed Martin/NISC)	A1-1 & A1-2	2nd paragraph	"...are in accordance with RTCA/DO-200B, section 2 and <b>we produce</b> < insert data type here > data in accordance with this system."	A comma is needed after "section 2" to separate the two independent clauses of this long sentence.  Also, is "we produce" meant to be in the present tense (to indicate ongoing production), or should the past tense be used here: "we produced" ?	Place a comma after "section 2" for:  "...are in accordance with RTCA/DO-200B, section 2, and <b>we produce</b> < insert data type here > data in accordance with this system."  * If "we produced" (past tense) is what is needed, change here and in the other sample letters where this is used.	Editorial	<b>Accepted.</b>
39	John Britton, AIR-500 (Lockheed Martin/NISC)	A1-2	1st paragraph	"ACME Avionics receives data from other sources, and develops..."	The comma here wrongly separates the noun from the verb "develops."	Strike the comma after "sources."	Editorial	<b>Accepted.</b>
40	John Britton, AIR-500 (Lockheed Martin/NISC)	A1-2	final paragraph	" <b>Compilation of data to</b> We developed the data..."	There is a sentence that begins with "Compilation of data to" that is unfinished.	Either strike the incomplete sentence or complete the sentence.	Editorial	<b>Accepted.</b>
41	John Britton, AIR-500 (Lockheed Martin/NISC)	A2-1	5.a.	"All other changes are considered major, and must be substantiated..."	The comma here does not belong.	Strike the comma.	Editorial	<b>Accepted.</b>
42	John Britton, AIR-500 (Lockheed Martin/NISC)	A2-1 & Universal	5.b.	"...ACME Data Company <b>shall</b> develop..."	As per FAA writing standards, the word "shall" is not to be used in ACs. "Shall" is used at least four times in this AC.	According to Order 1320.46D, <i>FAA Advisory Circular System</i> , Chapter 3, 7.f., use "must" to convey regulatory requirements. Do not use "shall," which is ambiguous.	Editorial	<b>Not Accepted.</b> This text is for a sample letter format that needs the use of the word "shall" to convey a contractual requirement between an ACO and a data supplier
43	John Britton, AIR-500 (Lockheed Martin/NISC)	A3-1	Box 1-1	"You must report... <b>to source...any all...</b> "	The use of "to source" and "any all" is awkward and cryptic.	Add additional words or a slash (to make "any/all") to make this objective easier to read.	Editorial	<b>Not Accepted.</b> This use of the word "source" has specific meaning to this material.
44	John Britton, AIR-500 (Lockheed Martin/NISC)	A3-1	Box 1-3	"You must endeavor, through documented procedure to ensure receipt of data..."	The modifying phrase "through documented procedure" is opened with a comma but never closed with a comma. Also, is "procedure" meant to be singular or plural?	Add a comma after the word "procedure." Also, if appropriate, change "procedure" to "procedures"  "You must endeavor, through documented procedure, to ensure receipt of data..."	Editorial	<b>Accepted.</b>

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45	John Britton, AIR-500 (Lockheed Martin/NISC)	A3-2	Box 1-8	"You must substantiate major design changes and the ACO/MIDO must accept..."	These two independent clauses (which can each stand alone as a sentence) must be separated by a comma before "and."	Add a comma before the word "and."	Editorial	<b>Accepted.</b>
46	John Britton, AIR-500 (Lockheed Martin/NISC)	A3-2	Box 1-9	"Procedures for reporting of changes to data process must address changes to tools used in its data process."	This sentence appears to be missing words ("the?") and is awkward.	Consider adding the word "the" between "to" and "data."	Editorial	<b>Accepted.</b>
47	John Britton, AIR-500 (Lockheed Martin/NISC)	A3-7	Box 4-2	"...any discrepancy or error in the data having potential safety effect on the..."	This sentence appears to be missing words ("a?") and is awkward.	Consider adding "a" for:  "...any discrepancy or error in the data having a potential safety effect on the..."	Editorial	<b>Accepted.</b>
48	ACE-110	1	1.2.3	aeronautical data process meet the objectives of this AC		aeronautical data process meets the objectives of this AC	Editorial	<b>Previously Accepted.</b>
49	ACE-110	2	3.1	A Letter of Acceptance (LOA) issued	already defined LOA in section 1.2.3	An LOA issued	Editorial	<b>Accepted.</b>
50	ACE-110	4	8.1	per the installation instruction of the equipment		per the installation instructions of the equipment	Editorial	<b>Accepted.</b>
51	ACE-110	7	9.1	the Type 2 data suppliers		the Type 2 LOA data suppliers	Editorial	<b>Accepted.</b>
52	ACE-110	8	9.1.2.4	first part of the paragraph	I must be reading this incorrectly because it seems backwards. I don't understand " for the other organization". It seems the "other organization" would be creating the packing tool...but the sentence seems to indicate the opposite.	reword if not indicating the message clearly	Editorial	<b>Not Accepted.</b> The "other organization" cannot create a packing tool for your data without full knowledge of design and intended function. This "other organization" is basically capturing use of a contract agent a data supplier would employ. No change was proposed.
53	ACE-110	8	9.2.1	when you apply for and obtain a database LOA		when you apply for and obtain a Type 2 database LOA	Editorial	<b>Accepted.</b>
54	ACE-110	8	9.2.1.1	the requirements of 14 CFR part 21, subpart O		the requirements of 14 CFR part 21, subpart O, rule 21.618.	Editorial	<b>Not Accepted.</b> There are other rules (e.g., 21.611) mentioning deviations, so it is entirely appropriate to reference the subpart only.

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55	ACE-110	9	9.2.3	Without a database LOA, database updates are a change to the TSO article	Minor change if a non-navigation function? What if database is navigation related....is it major? Should this be discussed here?	Author needs to decide if this comment is valid.	Conceptual	<b>Not Accepted.</b> Whether the change is minor or major, it is still a change to the TSO. We believe change management can be done via the LOA if there is one in place.
56	ACE-110	9	9.3	to be effective for large data sets or databases needing frequent update.	What is defined as frequent (i.e. monthly like a Jepp Database)? The Databases I am familiar with (Digma, Nav) all required monthly updates.	This is a comment or clarification.	Editorial	<b>Accepted.</b>
57	ACE-110	13	11.2.1.1	We recommend the use of verification or validation techniques whenever possible	Do you think we should require some validation for new systems? An OEM worth its weight would do so but maybe some outfits would not.	This is a comment or clarification.	Conceptual	<b>Not Accepted.</b> While a good point, the issue here is verification and validation activities are either recommended or required based on assurance level per the standard.
58	ACE-110	14	11.2.1.1	The FAA recognizes approvals by the CAA through bi-lateral agreement or EASA LOA / Data Supplier Certificate (EASA LOAs / Data Supplier Certificates demonstrating RTCA/DO-200A / RTCA/DO-200B (or EUROCAE ED-76 / EUROCAE ED-76A) are acceptable)	This section of the note is hard to read with all the parenthesis. Maybe it could be reworded.	reword if not indicating the message clearly	Editorial	<b>Not Accepted.</b> Use of parentheses to provide additional references is necessary. No change offered.
59	ACE-110	17	12.4.1	reference the DQRs in the instructions for continuing airworthiness.	Why are the DQRs required in the ICA?	question/comment	Conceptual	<b>Accepted.</b> Changed "must" to "can."
60	ACE-110	18	13.1.4	established to report to its Type 2 data supplier	should this be limited to Type 2 LOA data suppliers?	question/comment	Conceptual	<b>Not Accepted.</b> Only Type 2's integrate to hardware. A Type 1 is not for installation in avionics.
61	ACE-110	20	14.4	Society of Automotive Engineers (SAE) International Documents	I believe they don't call themselves Society of Automotive Engineers anymore.....just SAE.	question/comment	Editorial	<b>Accepted.</b>
62	ACE-110	A1-2	2nd paragraph	Compilation of data to	sentence is not complete	question/comment	Editorial	<b>Previously Accepted.</b>

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### AC 20-153B "Acceptance of Aeronautical Data Processes and Associated Databases"

#	Commenter	Page Number	Paragraph Number	Referenced Text	Comment/Rationale or Question	Proposed Resolution	Comment Type (Conceptual, Editorial, or Format)	Disposition
63	ACE-110	A3-1	1-1	any all failure, malfunction, or defect in the distributed data	any/all failure(s), malfunction, or defect in the distributed data	question/comment	Editorial	<b>Accepted.</b>
64	ACE-110	A3-1	1-3	You must endeavor, through documented procedure to	You must endeavor, through documented procedure, to	question/comment	Editorial	<b>Previously Accepted.</b>
65	ACE-110	A3-6	3-9	References must be provided for supplementary documentation	References in the TC or STC must be....	question/comment	Editorial	<b>Accepted.</b>
66	Brenda Ocher, ACE-117C	12	10.2.4	"Additionally, the FAA may perform periodic audits in accordance with procedures agreed to by you and the ACO/MIDO."	The FAA needs to quantify "periodic". FAA audits are not being done at regular intervals. Many data suppliers have not been audited since their initial LOA was issued.	Provide specific guidance regarding intervals between "periodic" audits. A risk-based approach should be used to determine the appropriate intervals considering factors such as the type of LOA and evidence that the data supplier's internal audit program is adequate.	Conceptual	<b>Accepted.</b>
67	Will Struck, ANM-111		General	Use of the term "must" in a means of compliance AC.	Typically, "must" is reserved for direct compliance with a regulation. ACs usually use "should".	Change "must" to "should" where a requirement is not a direct compliance with a regulation throughout document.	Conceptual	<b>Not Accepted.</b> Paragraph 1.1 states "must" indicates mandatory requirements when following the guidance in this AC. The terms "should" and "recommend" indicate recommended guidance, but are not required for meeting the objectives of this AC." AIR-100 legal supports this phraseology.
68	Will Struck, ANM-111	1	1.1	Section 1.1 discusses "meeting the objectives" of the AC. However, most of the AC "guidance" appears to be requirements, i.e., "You must ...".	Most of the statements in the AC are requirements, not objectives. (Same is true for the Appendix 3 "Objectives" matrices.)	Change "objective" to "requirements" throughout document.	Conceptual	<b>Accepted.</b> Made change to 1.1.
69	Will Struck, ANM-111	6	Paragraph 9. Figure 6	Flowchart	The flowchart needs clarity. It seems to leave the point open (about what to do) if the answer is no to the question "DO-200B process?"	This AC should be specific that this AC does not apply if AC 20-115C or an alternative means is being used.	Conceptual	<b>Accepted.</b>

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### AC 20-153B "Acceptance of Aeronautical Data Processes and Associated Databases"

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70	Thuan T. Nguyen, ANM-130S		General	Add statement to address structural coverage for databases.	Structural coverage for databases is different than for functional components.	Add statement to address structural coverage for databases.	Conceptual	<b>Not Accepted.</b> Tool qualification is now based on an adapted version of DO-330 found in DO-200B. Committee consensus was that for TQL 3, 4, and 5 that structural coverage was not needed and TQL 1 and 2 were <del>not either</del>
71	Thuan T. Nguyen, ANM-130S	1	Subject	Associated databases.	Provide clarity to reader.	Define the associated databases.	Conceptual	<b>Not Accepted.</b> Associated merely links the databases to the related data process, nothing more.
72	Thuan T. Nguyen, ANM-130S	3	5	Suggestion to provide a statement of other databases such as configuration files, registries, data structures, software options, operating program configuration, etc.	Provide clarity to reader.	Provide a clarification statement to address other types of databases.	Conceptual	<b>Not Accepted.</b> Already done in FAA Order 8110.49 and stated in 2 and 9.3.1 of AC.
73	Carmen Bonillo-Martinez / Anastasiya Terzieva, EASA	1	2	We wrote this AC for aeronautical data service providers, original equipment manufacturers,...	Editorial	We wrote this AC for aeronautical data services providers, original- <u>aircraft</u> equipment manufacturers,...	Editorial	<b>Accepted.</b>
74	Carmen Bonillo-Martinez / Anastasiya Terzieva, EASA	2	3.3	This AC requires data suppliers provide...	Editorial	This AC requires data suppliers <u>(also called Data (services) provider)</u> provide...	Editorial	<b>Not Accepted.</b> A Data Provider is a data supplier that produces data independent of application integration. The broader use is appropriate here for both Type 1 and 2

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75	Carmen Bonillo-Martinez / Anastasiya Terzieva, EASA	3	6.1	The end-user can meet this responsibility by obtaining data from a supplier accredited against this standard.	As per SC-217/WG-44 discussions to obtain data from an accredited supplier is "partially" discharging the end-user responsibility	The end-user can partially meet this responsibility by obtaining data from a supplier accredited against this standard. [Alternative proposal: The end-user (i.e. aircraft operator) can take credit from the oversight process of the data supplier as it would not be required to verify the integrity of the data for the indented use by using aeronautical databases provided by suppliers accredited against this standart without any further assurance of the data integrity and the processes in use.]	Editorial [Alternative proposal: Editorial & conceptual]	<b>Accepted.</b>
76	Carmen Bonillo-Martinez / Anastasiya Terzieva, EASA	4	Figure 1	Upstream flow DQR from Data Provider to AIP (State)	The AIP/Authoritative Source Data must not necessarily meet the end-user DQR	Remove the link or add note clarifying	Conceptual	<b>Not Accepted.</b> While not necessarily required to comply with DQR changes from end-user, the DQRs are levied all the way up the chain to the source. There is no responsibility at this level, but DQRs must be documented by the user
77	Carmen Bonillo-Martinez / Anastasiya Terzieva, EASA	4	Figure 1	Upstream flow DQR	in case of Type 2 Data Provider there should be a link between Data provider and Operator (end-User, Airline)	add a link from Operator to Data provider with DQR (in case of Type 2 Data provider) and a link from Data provider to Operator (in case of Type 2 Data provider)	Conceptual	<b>Not Accepted.</b> Link to Data Provider is provided through Application Integrator.
78	Carmen Bonillo-Martinez / Anastasiya Terzieva, EASA	5	8.3	installation eligibility		installation eligibility <del>privileges</del>	Editorial	<b>Accepted.</b>
79	Carmen Bonillo-Martinez / Anastasiya Terzieva, EASA	6	Figure 2	For TSOA and TC/STC projects	Requirements 9.2.2 and 9.2.3 or 9.3.2 may be interpreted as optional according to this figure.	Suggest to add a rectangle "Go to paragraph 9.2/9.3" and add the diamond/decision point subsequently: LOA Type 2? No -> Database updates follow design approval change process	Editorial	<b>Not Accepted.</b> Chart drives reader to decision about 9.2.1.2 or 9.3.1. If no LOA in place, then system verification is clearly required.

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### AC 20-153B "Acceptance of Aeronautical Data Processes and Associated Databases"

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80	Carmen Bonillo-Martinez / Anastasiya Terzieva, EASA	7	9.1.2.2	When under license or using design equivalence, the design approval holder is responsible	It can be interpreted that when not under licence..., the design approval holder is not responsible	When under license or using design equivalence, the design approval holder remains responsible ...	Editorial	<b>Accepted.</b>
81	Carmen Bonillo-Martinez / Anastasiya Terzieva, EASA	8	9.2.1.2	Define the verification and validation methods for all data not coming from authoritative source (reference paragraph 11.2.1).	Proposed wording more in line with 11.2.1.1 details	Define the verification for all data and validation methods for data not coming from authoritative source (reference paragraph 11.2.1).	Editorial	<b>Accepted.</b>
82	Carmen Bonillo-Martinez / Anastasiya Terzieva, EASA	9	9.3.1	same	same	same	Editorial	<b>Accepted.</b>
83	Carmen Bonillo-Martinez / Anastasiya Terzieva, EASA	10	9.3.2	The AFM must state any restriction/limitations concerning operating with expired aeronautical databases.	Are limitations only linked to "expired" databases?	suggest to remove "expired" or clarify	Editorial	<b>Accepted.</b>
84	Carmen Bonillo-Martinez / Anastasiya Terzieva, EASA	13	11.2.1	the responsibility to validate the incoming data meets the DQRs is discharged	Refer to comment on Figure 1. EASA regulation accounts for the following cases: if aeronautical data is not provided in the Aeronautical Information Publication (AIP) or by an authoritative source or <u>does not meet the applicable data quality requirements (DQRs)</u> , that aeronautical data shall be validated by the DAT provider itself and/or by other DAT provider. This allows to extend to future (or already developed) applications not addressed by existing standards RTCA EUROCAE ED-77 / RTCA DO-201A, EUROCAE ED-99C / RTCA DO-272C, ...	Harmonize with EASA	Conceptual	<b>Not Accepted.</b> Do not understand when it is acceptable to deviate from DQRs not acknowledged by the user. This was accounted for in the release statement and 13.1.3 user requirements. If a user needs to use data not previously validated, then they would be responsible to do so.

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85	Carmen Bonillo-Martinez / Anastasiya Terzieva, EASA	13, 18	11.2.1.1; 13.1.3	<b>Note:</b> Database production procedures of non-U.S. data suppliers should comply with RTCA/DO-200B (or EUROCAE ED-76A) to the satisfaction of the data supplier/user as verified by the supplier's civil aviation authority (CAA). The FAA recognizes approvals by the CAA through bi-lateral agreement or EASA LOA / Data Supplier Certificate (EASA LOAs / Data Supplier Certificates demonstrating RTCA/DO-200A / RTCA/DO-200B (or EUROCAE ED-76 / EUROCAE ED-76A) are acceptable). The approval by the CAA may be acceptable and should be equivalent to the FAA acceptance defined in this AC.	to align with the EASA terminology	<b>Note:</b> Database production procedures of non-U.S. data suppliers should comply with RTCA/DO-200B (or EUROCAE ED-76A) to the satisfaction of the data supplier/user as verified by the supplier's civil aviation authority (CAA). The FAA recognizes approvals by the CAA through bi-lateral agreement or EASA LOA / Data Supplier Certificate (EASA LOAs / Data <del>services provider</del> <del>Supplier</del> Certificates demonstrating RTCA/DO-200A / RTCA/DO-200B (or EUROCAE ED-76 / EUROCAE ED-76A) are acceptable). The approval by the CAA may be acceptable and should be equivalent to the FAA acceptance defined in this AC.	Editorial	<b>Accepted.</b>
86	Michael Chagnon, ANE-MIDO-42	9	9.3.1, 3rd Bullet down	"Define the data process techniques and procedures (i.e., Quality Management (QM) process) from origination of the data through loading the data into the application, of ensuring the quality of the data."	Sentence could use a few comma's or rewording to clarify	Recommend the following: Define the data process techniques and procedures for ensuring the quality of the data, (i.e., Quality Management (QM) process) from origination of the data through loading the data into the application.	Editorial	<b>Accepted.</b>
87	Michael Chagnon, ANE-MIDO-42	12	10.2.1	"You must endeavor, through documented procedure to ensure receipt of data alerts reporting safety related errors or defects."	Could use some commas to help clarify this sentence	Recommend the following: You must endeavor, through documented procedure, to ensure receipt of data alerts, reporting safety related errors or defects.	Editorial	<b>Previously Accepted.</b>
88	Michael Chagnon, ANE-MIDO-42	16	12.1	"For example, FMS suppliers to an OEM may document compatibility with its own FMS without the direct involvement of the OEM."	Use of acronyms without spelling out the acronym	Spell out FMS and OEM once when they are first used	Editorial	<b>Accepted.</b>

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89	Michael Chagnon, ANE-MIDO-42	17 & A3-6	12.4.1 & Objective Number 3-11	"The aircraft manufacturer, avionics manufacturer or systems integrator must also reference the DQRs in the <u>instructions for continuing airworthiness</u> ."	Instructions for Continued Airworthiness (ICAs) and Instructions for Continuing Airworthiness are used in multiple locations of the document. The acronym is used sometimes, other times it is not.	Replace instructions for continuing airworthiness with <u>instructions for continued airworthiness</u> and use the acronym ICAs consistently throughout the document.	Editorial	Accepted.
90	Michael Chagnon, ANE-MIDO-42	19	14.1.3	AC 25.1309-1, <i>Systems Analysis and Design</i>	Title of AC is reversed	Should read: AC 25.1309-1, <i>Systems Design and Analysis</i>	Editorial	Accepted.
91	Michael Chagnon, ANE-MIDO-42	19	14.1.4	AC 23.1309-1, <i>Equipment, Systems, and Installations in Part 23 Airplanes</i>	Title of AC is incorrect - referenced cancelled document's title	Should read: AC 23.1309-1, <i>System Safety Analysis and Assessment for Part 23 Airplanes</i>	Editorial	Accepted.
92	Michael Chagnon, ANE-MIDO-42	20	14.3.8	RTCA/DO-291C, <i>Interchange Standards for Terrain, Obstacle and Aerodrome Mapping Data</i>	Left out the word <i>Minimum</i> in the title	Should read: RTCA/DO-291C, <i>Minimum Interchange Standards for Terrain, Obstacle and Aerodrome Mapping Data</i>	Editorial	Accepted.
93	Michael Chagnon, ANE-MIDO-42	A1-1 & A1-2	Figures 1 & 2	ACME Data Company PO Box 1919 Green Bay, WI 81119	In the second paragraph of the example the address is listed as 1919 Lombardi Avenue	Recommend changing PO Box 1919 to: 1919 Lombardi Avenue to eliminate any confusion.	Editorial	Accepted.
94	Michael Chagnon, ANE-MIDO-42	A1-2	Figure 2	"Compilation of data to We developed the data at ACME Avionics, 1919 Lombardi Avenue, Green Bay, WI 81119."	Not sure what was trying to be said in the last paragraph, second sentence of this example?	Recommend changing it to read: The data was developed at ACME Avionics, 1919 Lombardi Avenue, Green Bay, WI 81119	Editorial	Previously Accepted.
95	Michael Chagnon, ANE-MIDO-42	A2-1 & A2-3	Figures 1 & 2	ACME Data Company PO Box 1919 Green Bay, WI 81119	In other examples listed previously, the address is listed as 1919 Lombardi Avenue	Recommend changing PO Box 1919 to: 1919 Lombardi Avenue to eliminate any confusion.	Editorial	Accepted.
96	Michael Chagnon, ANE-MIDO-42	A3-1	Objective Number 1-1	You must report to customers (application provider, end-user, etc.), the FAA and to source (if applicable) any <b>all</b> failure, malfunction, or defect in the distributed data having potential to adversely affect the safety of operational use.	The word "all" is not necessary	Remove the word all to match the verbiage in paragraph 10.2.1	Editorial	Previously Accepted.
97	Michael Chagnon, ANE-MIDO-42	A3-6	Objective Number 3-11, Reference	References 12.4.2	Incorrect reference to 12.4.2	Recommend referencing the correct paragraph: 12.4.1	Editorial	Accepted.

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98	Michael Chagnon, ANE-MIDO-42	A3-7	Objective Number 4-4, Reference	References 13.2.3	Paragraph 13.2.3 does not exist. Incorrect reference	Recommend referencing the correct paragraph: 13.2	Editorial	<b>Accepted.</b>
99	Marc Ronell, ANE-150	3	6.1	"Several characteristics define data quality including accuracy, resolution, assurance level, timeliness, completeness, traceability and format."	The AC really describes flat data files, not relational database management systems (rdms). Most places refer to an RDMS as a database and regular files, regardless of their formatting, as flat files. Using an actual RDMS offers so many advantages that for large files most opt to employ an RDMS. Data look up can be much faster as can compression. On key item which is missing from the list in the referenced text column is data security. Almost all RDMS systems inherently include data security as part of their basic architecture. RDMS will also help with data integrity.	Refer to flat data files as flat files and start to introduce the RDMS concept to move the industry to modernizing their technology and approach. Although some recalcitrant applicants may complain, the move would help modernize and better secure critical data systems.	conceptual	<b>Not Accepted.</b> I acknowledge many of the superior characteristics of RDMS. However, the choice of database format was historically a hard issue to force advancement in. ARINC 424 is just a flat, ASCII text file with no indexing capability. This causes FMSs to index for extended periods on start-up, but also allows the 424 files to remain quite small. There are efforts to update navigation data to XML, so I would prefer to leave data format rather generic at this time.
100	Marc Ronell, ANE-150	4	8.1	For those applications requiring database integrity (e.g., Area Navigation (RNAV), Required Navigation Performance (RNP) Routes, Synthetic Vision System (SVS), terminal procedures, airport moving map displays, Terrain Awareness and Warning System (TAWS), etc.), the LOA may be used as evidence of compliance with RTCA/DO-200B.	Regarding "database integrity", because the data is generally accessed through an RDMS, the underlying set of information files is highly dependent on the RDMS which is used to store the data. Typically, when the data is say exported from one RDMS, it is exported as a set of SQL statements which include the dB scheme and then data to be inserted into the resulting tables. Trying to specify properties of the underlying dB files seems to be counter productive, perhaps stifling innovation?	Introduce the use of RDMS systems and discuss the functions and systems which access the data and work to ensure its integrity. Describe data content verification maybe?	conceptual	<b>Not Accepted.</b> See previous.

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101	Marc Ronell, ANE-150	3, 4	5, 7, 8	The documents asks and theoretically answers the following questions "What is Aeronautical Data?", "What is the Aeronautical Data Chain?", and "What is a Database LOA?"	Why does the document not clearly, and early in the same vicinity ask "What is a Database?". Maybe the intent of the answer to "What is Aeronautical Data?" is to define a database, but the answer does not do that.	Perhaps a separate section could be added to define the use of the term database in this document? Perhaps adding something along the lines that in this document, a database is defined as a formatted collection of aeronautical data and the functions and methods used to access and preserve the integrity of that data?	conceptual	<b>Not Accepted.</b> As a means of compliance utilizing the standard, DO-200B, the concepts you highlight are found and defined in that document.
102	Marc Ronell, ANE-150	9.3.1	9	"FAA Order 8110.49 (Chapter 15) describes three types of installed databases: (1) aeronautical databases, (2) airborne system databases, and (3) other databases, which are not part of the type design of the aircraft (e.g., Electronic Flight Bag (EFB) Type A and B, Electronic Checklist (ECL), user modifiable, etc.)"	Actually, Order 8110.49 §15-2 (1) mentions: a. Aeronautical databases, which are used by an airborne system and whose development processes are typically approved using the guidance of RTCA/DO-200A, AC 20-153A, and Order 8110.55. (1) Aeronautical databases should be demonstrated to comply with RTCA/DO-200A or other acceptable means. RTCA/DO-200A defines requirements and an acceptable means of compliance for participants processing aeronautical databases. If followed, it provides assurance that the production of aeronautical databases meets the integrity requirements for intended function, based on design assurance levels or software levels. It addresses specifics of the aeronautical data process, and assumes that participating organizations have an acceptable quality management system. (2) AC 20-153A applies to	Please actually describe and define "aeronautical database" directly in AC 20-153B or at least what the agency intends to mean by the term.	conceptual	<b>Not Accepted.</b> See previous.

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103	Marc Ronell, ANE-150	10.1.4	10,11	Various	These sections all seem to refer to verifying the integrity of formatted, electronically stored data, but it does not limit itself to direct access of flat files of stored data.	I still don't understand what is intended by the word database? Jim Grey and Jeffery Ullman wrote extensively on the topic of database systems. I am not sure the agency definition matches the accepted practice.	conceptual	<b>Not Accepted.</b> See previous.
104	Marc Ronell, ANE-150	Appendix A3	A3-3	Missing item maybe?	Does there need to be an item requiring suppliers to include data set version numbers and dates which will distinguish one set of data from a later delivery?	Add an item to require a data set to include versioning information such as a version number, date and potentially part number or product number.	conceptual	<b>Not Accepted.</b> Configuration management requirements are found in DO-200B, Appendix F, Objectives 5-1 thru 5-17. The expressed traceability concerns should be handled by these objectives.
105	Marc Ronell, ANE-150	Appendix A3	A3-7	Missing item maybe?	Require operator/end-user to confirm the correct version is installed.	Prevents inadvertent installation of an earlier version.	conceptual	<b>Not Accepted.</b> See previous.